## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ROBIN JOACHIM DARTELL, et al., Individually and on Behalf of All Others Similarly Situated

Plaintiff,

Civil Action No. 14-CV-3620-JMV

VS.

TIBET PHARMACEUTICALS, INC., et al Defendant.

P. VAN HOVE BVBA, PASCAL VAN HOVE GCV, JOHN THOLLON, MICHAEL ZABINSKI, JEAN DOYLE, AND MARK LAROSA, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED, Plaintiffs,

VS.

UNIVERSAL TRAVEL GROUP, INC.,
JIANGPING JIANG, YIZHAO ZHANG, JIANG
XIE, JIDUAN YUAN, LAWRENCE LEE,
LIZONG WANG, DAVID T. SVOBODA, AND
ACQUAVELLA, CHIARELLI, SHUSTER & CO.,
LLP, ACQUAVELLA, CHIARELLI, SHUSTER,
BERKOWER & CO., LLP, JOSEPH P.
ACQUAVELLA, SANTO CHIARELLI, SAMUEL
SHUSTER, AND MAURICE BERKOWER,

CASE No.: 2:11-cv-2164-JMV

Defendants.

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO SEAL

Before the Court is Plaintiffs' Motion to Seal. The Court, having reviewed Plaintiffs' Motion to Seal, and the Court finding that:

- (a) The insurance policies referenced in Plaintiffs' Motion to Seal contain confidential information concerning the amount of the policies:
- (b) It is important not to have the insurance policies publicly filed, as doing so could disrupt arms-length negotiated settlements;
- (c) The supplemental agreements concerning the proposed settlements referenced in Plaintiffs' Motion to seal contain provisions concerning the number of shares of stock that would have to opt-out of the respective settlements such that the respective settling defendants would be able to exercise the right to terminate the settlement; and
- (d) It is important not to have the supplemental agreements filed publicly, as doing so could disrupt an arms-length negotiated settlement.

IT IS ORDERED that the Plaintiffs may file under seal the documents referenced in their Motion to Seal.

IT IS FURTHER ORDERED that the above-referenced documents shall be maintained under seal by the Clerk of the Court.

Dated: <u>January</u>, <u>17</u> 201]

SO ORDERED:

UNITED STATES DISTRICT JUDGE

HON. JOHN-MICHAEL VASQUEZ Jank, IT Magistrate

[This Order terminates Docket Entry No. 251].